



Order Filed on October 15, 2020  
by Clerk  
U.S. Bankruptcy Court  
District of New Jersey

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

**Caption in Compliance with D.N.J. LBR 9004-1(b)**

**RAS Citron, LLC**  
130 Clinton Road – Lobby B, Suite 202  
Fairfield, NJ 07004  
Telephone No.: 973-575-0707  
Fax No.: 973-404-8886  
Attorneys for Secured Creditor

Harold Kaplan HK0226

In Re:

**Salvatore M. Campo,**

**Debtor,**

Case No.: 19-32625

Chapter: 13

Hearing Date: 9/1/2020

Judge: Jerrold N. Poslusny Jr.

**AGREED ORDER RESOLVING SECURED CREDITOR'S MOTION FOR RELIEF  
FROM THE AUTOMATIC STAY**

The relief set forth on the following pages, numbered two (2) through three (3), is hereby  
ORDERED.

**DATED: October 15, 2020**

A handwritten signature in dark ink, appearing to read "Jerrold N. Poslusny, Jr.", is written over a horizontal line.

Honorable Jerrold N. Poslusny, Jr.  
United States Bankruptcy Court

Page 2

**Secured Creditor: JPMorgan Chase Bank, N.A.**  
**Secured Creditor's Counsel: RAS Citron, LLC**

**Debtors' Counsel: Eric Clayman**

Property Involved ("Collateral"): 2007 Ford F150 VIN: 1FTPW14V97FA16343

Relief sought:

- ☒ Motion for relief from the automatic stay
- ☐ Motion to dismiss
- ☐ Motion for prospective relief to prevent imposition of automatic stay against the collateral by debtor's future bankruptcy filings

Whereas Secured Creditor filed a Motion for Relief from Stay on 7/31/2020,

And

Where as the debtor filed a response and modified plan providing for payment of the entire balance due Secured Creditor.

And

Whereas the parties have agreed to the payment of interest at a rate of 4 percent to be paid over the remaining 44 months of the Debtor's Chapter 13 Plan.

For good cause shown, it is **ORDERED** that Secured Creditor's Motion is resolved, subject to the following conditions:

### Status of post-petition arrearages

**Total principal Balance due to pay loan in full \$4,094.34.**

- The amount of \$4,094.34 with interest at a rate of 4 percent over the remaining 44 months of the Debtor's plan, for a total to be paid Secured Creditor of \$4,409.00, shall be paid in the Debtor's Chapter 13 plan by the Chapter 13 Trustee.
- This Order is incorporated into any Order confirming the plan. The Trustee is to pay Secured Creditor the amount identified in this Order.

3. Payments to the Secured Creditor shall be sent to the following address

JPMorgan Chase Bank, N.A.  
National Bankruptcy Department  
P.O. Box 901032

Ft. Worth, Texas 76101-2032

4. In the event of Default:

■ Should the Debtor(s) fail to make timely payments to the Chapter 13 Trustee, and if any regular monthly trustee payment should become more than thirty (30) days late or if Debtor(s) fails to comply with any terms of this Consent Order, counsel shall file a Certification of Default with the Court. A copy of the Certification shall be sent to the Chapter 13 Trustee, the Debtors, and Debtors' attorney and the court shall enter an Order granting relief from the Automatic Stay. Debtor shall pay \$200.00 for each notice of default issued by Secured Creditor as a result of the Debtor's failure to comply with this Consent Order.

■ In the event the Debtor(s) convert(s) to a Chapter 7 during the pendency of this bankruptcy case, the Debtor(s) shall payoff the remaining amount still due within 10 days from the date of conversion. Should the Debtors fail to pay off the balance still due, counsel shall file a Certification of Default with the Court, a copy of the Certification shall be sent to the Chapter 13 Trustee, Chapter 7 Trustee, the Debtors, and Debtors' attorney and the court shall enter an Order granting relief from the Automatic Stay.

5. Award of Attorneys' Fees:

■ The Applicant is awarded attorney fees of \$350.00 and costs of \$181.00.

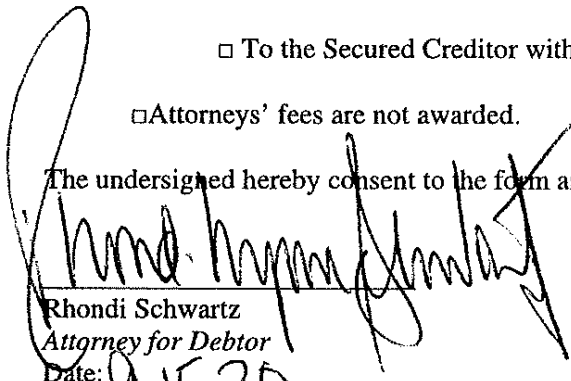
The fees and costs are payable:

■ Through the Chapter 13 plan.

□ To the Secured Creditor within \_\_\_\_\_ days.

□ Attorneys' fees are not awarded.

The undersigned hereby consent to the form and entry of the foregoing order.

  
Rhondi Schwartz  
Attorney for Debtor

Date: 9-15-20

/s/ Harold Kaplan

Harold Kaplan  
Attorney for Secured Creditor

Date: 9/16/2020

In re:  
Salvatore M. Campo  
Debtor(s)

Case No. 19-32625-JNP  
Chapter 13

## CERTIFICATE OF NOTICE

District/off: 0312-1  
Date Rcvd: Oct 16, 2020

User: admin  
Form ID: pdf903

Page 1 of 2  
Total Noticed: 1

The following symbols are used throughout this certificate:

Symbol	Definition
+	Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Oct 18, 2020:

Recip ID	Recipient Name and Address
db	+ Salvatore M. Campo, 1228 Burlington Avenue, Deptford, NJ 08096-3074

TOTAL: 1

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.  
Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI).

NONE

## BYPASSED RECIPIENTS

The following addresses were not sent this bankruptcy notice due to an undeliverable address, \*duplicate of an address listed above, \*P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

NONE

## NOTICE CERTIFICATION

I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Oct 18, 2020

Signature: /s/Joseph Speetjens

## CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on October 16, 2020 at the address(es) listed below:

Name	Email Address
Denise E. Carlon	on behalf of Creditor MIDFIRST BANK dcarlon@kmlawgroup.com bkgroup@kmlawgroup.com
Eric Clayman	on behalf of Debtor Salvatore M. Campo jenkins.clayman@verizon.net connor@jenkinsclayman.com
Harold N. Kaplan	on behalf of Creditor JPMORGAN CHASE BANK N.A. hkaplan@rasnj.com, informationathnk@aol.com
Isabel C. Balboa	ecfmail@standingtrustee.com summarymail@standingtrustee.com
Isabel C. Balboa	on behalf of Trustee Isabel C. Balboa ecfmail@standingtrustee.com summarymail@standingtrustee.com
Jane L. McDonald	on behalf of Trustee Isabel C. Balboa ecf@standingtrustee.com

District/off: 0312-1

User: admin

Page 2 of 2

Date Rcvd: Oct 16, 2020

Form ID: pdf903

Total Noticed: 1

Rhondi L. Schwartz

on behalf of Debtor Salvatore M. Campo jenkins.clayman@verizon.net

Sindi Mncina

on behalf of Creditor JPMORGAN CHASE BANK N.A. smncina@rascrane.com

Stephanie F. Ritigstein

on behalf of Debtor Salvatore M. Campo jenkins.clayman@verizon.net connor@jenkinsclayman.com

U.S. Trustee

USTPRegion03.NE.ECF@usdoj.gov

TOTAL: 10